

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HEIDI SIPPEL HAAS, on behalf of herself)	
and others similarly situated,)	
)	
Plaintiff,)	Case No. 22-cv-02071
)	
v.)	Honorable John Robert Blakey
)	
STERICYCLE, INC.,)	
)	
Defendant.)	

**AGREED MOTION TO DISMISS WITHOUT
PREJUDICE AND SUBMIT TO ARBITRATION**

Now come Plaintiff Heidi Sippel Haas, individually and on behalf of the eight additional individuals who have filed consents to join this action to date (“Plaintiffs”) and Defendant Stericycle, Inc. (“Defendant”) (collectively, the “Parties”), by and through their counsel of record, and hereby submit this Agreed Motion to Dismiss, without prejudice, this action for arbitration. In support thereof, the Parties state as follows:

1. Following the exchange of information, the Parties mediated this case before wage and hour mediator Jason Bristol on September 28, 2022.
2. As set forth in prior pleadings, Defendant asserts that Plaintiffs have entered into individual arbitration agreements with Defendant. [ECF Nos. 18, 23]. Plaintiff Sippel Haas’ arbitration agreement and signature page are attached as **Exhibit 1**.
3. In lieu of continuing the case in this Court, the Parties have agreed that Plaintiffs’ pending claims will be resolved through binding arbitration before an Arbitrator agreed upon between the Parties.

4. The Parties agree that Plaintiffs' claims shall be submitted to arbitration before an Arbitrator agreed upon between the Parties and that arbitration will provide the exclusive, final, and binding method to resolve Plaintiffs' claims.

5. In light of these agreements, the Parties respectfully request that this action be dismissed in its entirety, without prejudice, to be pursued in arbitration. Neither Party seeks an award of fees or costs from this Court.

6. The Parties will submit a proposed Order to the Court's proposed order inbox.

WHEREFORE, Plaintiff Heidi Sippel Haas, individually and on behalf of the eight additional individuals who have filed consents to join this action to date, and Defendant Stericycle, Inc., respectfully request that this honorable Court enter their proposed Order granting the Parties' Agreed Motion and dismissing this action without prejudice.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on October 12, 2022, she filed the foregoing ***Agreed Motion to Dismiss Without Prejudice and Submit to Arbitration*** electronically with the Clerk of Court using the Court's ECF system, which sent notification of such filing to the following:

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